

Attachment 1  
List of Changes for Conditional Approval of the Portland Harbor RI Report  
January 8, 2016

Document File	Required Change	LWG Comment and/or Clarification Request. No entry indicates we will make the revision change as directed.	EPA Response/Direction
Global changes	Remove “total” before DDx in all instances throughout report. EPA has done this in text; however, LWG needs to do this for the remainder of the report. EPA will identify below where it has been identified that files require this modification.	<ol style="list-style-type: none"> <li>1. This can be done, but throughout the Final BERA (RI Appendix G) and in the HHRA tables (RI Appendix F) “total DDx” is used. We propose retaining “total” in the RI for consistency with the RAs.</li> <li>2. EPA has not done this in the text files we received for Sections 5 and 10. Please confirm that we received the final EPA files.</li> <li>3. If, the LWG will remove it as stated in EPA’s Required Change (specifically, where EPA has identified below those files that require this modification).</li> </ol>	EPA directs that “total” be removed before DDx. EPA has provided updated files for Sections 5 and 10 with this change.

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	Prepare electronic version of report in accordance with EPA guidelines. See file How to Create a Web-Ready PDF.docx		
<b>Text &amp; Front Matter</b>	Combine Title Page, Executive Summary, Table of Contents, List of Figures, List of Tables, List of Maps, List of Acronyms, and section text into one pdf file.	Typically, we would place the Executive Summary at the end of the front matter. Does EPA want it immediately after the title page?	Placing the Executive Summary at the end of the front matter is acceptable.
	Remove all comments.		
Title Page	Add “Prepared for the USEPA by Respondents to the Administrative Settlement Agreement and Order on Consent for Remedial Investigation and Feasibility Study U.S. EPA Docket Number CERCLA-10-2001-0240”	The LWG is compiling this document as directed by EPA, and it fully intends to comply with all of its obligations under the AOC. However, as explained in the LWG’s letter of June 12, 2015, because this document is no longer the work of the LWG and its consultants, the LWG requests that the document’s authorship not be cited as or attributed to the LWG. This change has no substantive effect. The LWG therefore requests that EPA withdraw this required change.	The AOC states that the Respondents shall submit this document; thus, changing the word “prepared” to “submit” is acceptable. Changing the word “prepared” to “produced” would also be acceptable. This in no way implies that the LWG or its contractors authored the document. The citation to the document will be USEPA 2016.

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	Update date to February 8, 2016.		
Executive Summary	See file 2016-01-08 Portland Harbor RI Executive Summary.docx		
Table of Contents, List of Figures, List of Tables, List of Maps	Update with required changes to titles as provided in detail below.		
List of Acronyms	No changes		
Section 1.0 Text	See file 2016-01-08 Portland Harbor RI Section 1 Text.docx	<ol style="list-style-type: none"> <li>1. Per the direction to delete Section 12 (glossary) below, we will also delete mention of Section 12 in bulleted report organization list in Section 1.</li> <li>2. EPA does not mention Appendix I (interactive maps) in these comments. Are these to be included? If not, we will delete their listing in the TOC, and brief mention in Section 1 and Section 10.</li> </ol>	<ol style="list-style-type: none"> <li>1. EPA agrees with this change.</li> <li>2. There was no mention of Appendix I because it was not provided to EPA for review. EPA would still like for the interactive maps for Appendix I to be included in the final version of the document.</li> </ol>
Section 2.0 Text	See File 2016-01-08 Portland Harbor RI Section 2 Text.docx		

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Section 3.0 Text	See File 2016-01-08 Portland Harbor RI Section 3 Text.docx		
Section 4.0 Text	See File 2016-01-08 Portland Harbor RI Section 4 Text.docx		
Section 5.0 Text	See File 2016-01-08 Portland Harbor RI Section 5 Text.docx		
Section 6.0 Text	See File 2016-01-08 Portland Harbor RI Section 6 Text.docx Text in this section has been modified. EPA has retained original numbers to tables, maps and figures in these modifications. Table, map, and figure numbers may need to be revised based on text modifications.		
Section 7.0 Text	See File 2016-01-08 Portland Harbor RI Section 7 Text.docx		

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Section 8.0 Text	See File 2016-01-08 Portland Harbor RI Section 8 Text.docx		
Section 9.0 Text	See File 2016-01-08 Portland Harbor RI Section 9 Text.docx		
Section 10.0 Text	See File 2016-01-08 Portland Harbor RI Section 10 Text.docx		
Section 11.0 Text	No changes.		
Section 12.0 Text	Delete this section.		
<b>Maps</b>	Combine maps for sections 1-10 into one pdf file.	This will create a 210 MB file that will be difficult to download and work with. We recommend generating a set of map files that are approximately 50 MB each.	EPA agrees that the map file should be broken up into smaller files of approximately 50 MB each. Please provide a list of maps to be included in each map file for approval.

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	Update all headers to “Portland Harbor RI/FS Final Remedial Investigation Report February 8, 2016”	Due to the labor and time-intensive effort needed to update the existing headers as requested, we propose adding this statement to the top right of each map. An example of this alternative approach is attached for EPA review. If EPA does not accept this alternative approach, the LWG will need to discuss with EPA the time that will be required to do it as EPA has directed, because this will have a schedule impact.	The attached document seemed to follow EPA’s original direction, so it is unclear the request being made by the Respondents.
Section 1.0 Maps	No changes.		
Section 2.0 Maps	No changes.		
Section 3.0 Maps	No changes.		
Section 4.0 Maps	No changes.		
Section 5.0 Maps	Change all instances of “Total DDx” to “DDx”. Maps 5.2-13, 5.2-14a-hh, 5.2-15, 5.5-1, 5.6-1a-b, 5.6-2a-b, 5.6-3a-c, 5.6-4a-b, 5.6-5a-f, 5.6-7a-d, 5.6-8, 5.6-9a-b, 5.6-10a-b, 5.6-11a-f, 5.6-12a-e, 5.6-13a-b, 5.6-14a-f, 5.6-15a-b, 5.6-16	See previous comment.	See direction above.

<b>Document File</b>	<b>Required Change</b>	<b>LWG Comment and/or Clarification Request. No entry indicates we will make the revision change as directed.</b>	<b>EPA Response/Direction</b>
Section 6.0 Maps	No changes. May need to update map numbers based on text modifications.		
Section 7.0 Maps	No changes.		
Section 10.0 Maps & Panels	Change all instances of “total DDx” to “DDx”. Panels 10.2-3A-C	See previous comment.	See EPA direction, above.
<b>Tables</b>	Combine tables for sections 1-10 into one pdf file.		
	Update all headers to “Portland Harbor RI/FS Final Remedial Investigation Report February 8, 2016”		
Section 2.0 Tables	Change all instances of “total DDx” to “DDx”. Tables 2.3-3, 2.3-4, 2.3-5, 2.3-6, 2.3-7, 2.3-9a-b	See previous comment.	See EPA direction, above.
Section 3.0 Tables	No changes.		
Section 4.0 Tables	Change all instances of “total DDx” to “DDx”. Tables 4.4-4, 4.4-6	See previous comment.	See EPA direction, above.

Document File	Required Change	LWG Comment and/or Clarification Request. No entry indicates we will make the revision change as directed.	EPA Response/Direction
Section 5.0 Tables	Change all instances of “total DDx” to “DDx”. Tables 5.1-2, 5.2-1, 5.2-2, 5.2-3, 5.2-4, 5.2-5, 5.2-6, 5.2-7, 5.2-8, 5.2-9, 5.2-10, 5.2-11, 5.2-12, 5.2-13, 5.2-14, 5.2-15, 5.2-16, 5.2-17, 5.2-18, 5.2-19, 5.2-20, 5.2-21, 5.2-22, 5.3-2, 5.3-3, 5.3-4, 5.3-5, 5.3-6, 5.3-7, 5.4-6, 5.4-7a,b&d, 5.4-8, 5.4-9a,b&d, 5.4-10, 5.4-11a,b&d, 5.4-15, 5.5-1, 5.5-2, 5.6-1, 5.6-2, 5.6-4, 5.6-5, 5.6-6, 5.6-7	See previous comment.	See EPA direction, above.
	Table 5.4-9d: Table is numbered 5.4-7d, change to 5.4-9d.		
Section 6.0 Tables	May need to update table numbers based on text modifications.		
	Change all instances of “total DDx” to “DDx”. Tables 6.0-1, 6.1-2, 6.1-4, 6.1-5a-b, 6.1-7, 6.1-8, 6.1-9, 6.1-10, 6.1-11, 6.3-1, 6.3-2, 6.3-3, 6.3-4, 6.3-5	See previous comment.	See EPA direction, above.
	Table 6.1-1: Delete this table.		



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Section 7.0 Tables	Table 7.3-1: See File 2016-01-08 Portland Harbor RI Section 7 Table 7.3-1.docx		
Section 8.0 Tables	Add a new Table 8.4-3 with the list of 29 contaminants.	Can EPA provide this table?	This is Table 7-1 in the BHHRA. EPA notes that there are only 27 contaminants and has provided modified text to Section 8 reflect this.
Section 9.0 Tables	Table 9.11-1: See File 2016-01-08 Portland Harbor RI Section 9 Table 9.11-1.pdf		
Section 10.0 Tables	Tables 10.2-1 through 10.2-13: Remove all footnotes that do not apply to table and renumber footnotes.		
	Change all instances of “total DDx” to “DDx”. Tables 10.2-14a-b	See previous comment.	See EPA direction, above.
<b>Figures</b>	Combine figures for sections 1-10 into one pdf file.		

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	Update all headers to “Portland Harbor RI/FS Final Remedial Investigation Report February 8, 2016”	As with the maps, we propose adding this statement at the top right of each figure panel as an alternative approach. If EPA does not accept this alternative approach, the LWG will need to discuss with EPA the time that will be required to do it as EPA has directed, because this will have a schedule impact.	See EPA response to maps.
Section 2.0 Figures	No changes.		
Section 3.0 Figures	No changes.		
Section 4.0 Figures	No changes.		
Section 5.0 Figures	Change all instances of “total DDx” to “DDx”. Figures 5.2-10, 5.2-11, 5.2-12, 5.3-5a-b, 5.4-20, 5.4-21a-b, 5.4-22, 5.4-23a-b, 5.4-71a-b, 5.4-72a-b, 5.4-73a-b, 5.5-1a, 5.6-4a-e, 5.6-18	See previous comment.	See EPA direction, above.
Section 6.0 Figures	May need to update figure numbers based on text modifications.		
	Change all instances of “total DDx” to “DDx”. Figures 6.1-6, 6.1-7, 6.1-19, 6.1-24, 6.1-34, 6.1-35, 6.1-37, 6.1-41, 6.1-46, 6.1-51, 6.1-59, 6.3-6	See previous comment.	See EPA direction, above.

<b>Document File</b>	<b>Required Change</b>	<b>LWG Comment and/or Clarification Request. No entry indicates we will make the revision change as directed.</b>	<b>EPA Response/Direction</b>
	Remove all instances of “non-DDx” and list out all pesticides presented. Figures 6.1-12, 6.1-13, 6.1-28, 6.1-37, 6.1-54, 6.2-8		
Section 7.0 Figures	Delete “High-biasing non-detects” from the legend of the following figures: 7.3-3, 7.3-5, 7.3-6, 7.3-9, 7.3-10, 7.3-12, 7.3-13, 7.3-14, 7.3-15. In all remaining figures, correct the spelling of “baising” to “biasing.” Delete “Total” from “Total DDx” on figure 7.3-7.		
Section 8.0 Figures	Add Figure 8.2-1. Human Health CSM.	We will re-insert the human health CSM Figure 8.2-1 from the 2011 Draft Final RI.	
Section 9.0 Figures	No changes.		
Section 10.0 Figures	Change all instances of “total DDx” to “DDx”. Figures 10.2-7a-b, 10.2-8, 10.2-9	See previous comment.	See EPA direction, above.
<b>Appendix A</b>	No changes. Provide combined file and database files.		

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	Update all headers to “Portland Harbor RI/FS Final Remedial Investigation Report February 8, 2016”		
	Update date on cover page to February 8, 2016.		
<b>Appendix B</b>	No changes.		
	Update date on cover page to February 8, 2016.		
<b>Appendix C</b>	Combine all documents for Appendix C into one pdf file.		
	Provide Cover page for Appendix C.		
	Appendix C1: Provide cover page.		
	Update date on cover pages to February 8, 2016.		
<b>Appendix D</b>	See file 2016-01-08 Portland Harbor RI Appendix D1.5.docx		
	See file 2016-01-08 Portland Harbor RI Appendix D2.3.docx		

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	See file 2016-01-08 Portland Harbor RI Appendix D3.3.docx		
	See file 2016-01-08 Portland Harbor RI Appendix D4.4.docx		
	See file 2016-01-08 Portland Harbor RI Appendix D5.3.docx		
	Update date on cover pages to February 8, 2016.		
<b>Appendix E</b>	See files 2016-01-08 Portland Harbor RI Appendix		
	E.docx 2016-01-08 Portland Harbor RI Attachment E1.docx		
	Delete “total” from “total DDx” in Figures E2-1, E2-17, Maps E3-19 a and b, E6-2, and from the following Tables: E2-1, E2-4, E2-6, E2-7, E3-1, E3-5a, E3-5b, E3-9, E5-1a, E5-1b, E5-2, E6-2, E6-4, E6-5, E6-7, E6-8	See previous comment.	See EPA direction, above.

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	<p>All Appendix E figures: Replace the term “sub-averaged” with “averaged.”</p> <p>Maps E6-1 and E6-2: Delete the term “sub” from “sub-polygons.” Change “polygon rejected from analysis” to “polygon not included in analysis.”</p>		
	<p>Maps E6-1 and E6-2: Delete the term “sub” from “sub-polygons.” Change “polygon rejected from analysis” to “polygon not included in analysis.”</p>		
	<p>Figures E3-2 and E3-3: Delete “Processed” from “Processed data.”</p>		
	<p>Attachment E1: Change title page to “Stormwater Loading Preliminary Data Analysis Steps”</p>		
Appendix F	No changes.		
Appendix G	No changes.		

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Appendix H	Delete “high biasing non-detects” from the legend of figures H1-1, H1-3, H1-4, H1-10, H1-11, H1-12, H1-14, H1-16, H1-17, H1-18, H1-19. Correct the spelling of “biasing” in all other figures.		
Other		The LWG notes that the Final RI text files provided by EPA are not in Redline/Strikeout mode so it is not possible to know or focus on what has been revised. The LWG does not plan to do a full document comparison to check EPA’s final changes and will accept everything as is. The LWG will endeavor to fix obvious typos and formatting issues created by the EPA edits where those are apparent, e.g., header indentation offsets, for final document internal consistency.	

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		<p>The LWG will produce one hard copy version of the report by February 8. The LWG will be able to provide additional hard copies after that date.</p> <p>The following Appendices will be provided on DVD only and not be printed as part of the hard copy of the RI:</p> <p>Appendix A2—Data excluded from RI data set  Appendix A3—SCRA database  Appendix A5—Portland Harbor RI/FS data reports  Appendix C1—Stormwater summary stats (84 pages)</p>	<p>One hard copy and three electronic copies are to be provided to Kristine Koch on Feb 8. All additional hard copies and electronic copies to other EPA staff or MOU partners can be provided after that date.</p> <p>EPA agrees that the Appendix files listed can be provided on a DVD rather than hard copy.</p>



Document File	Required Change	LWG Comment and/or Clarification Request. No entry indicates we will make the revision change as directed.	EPA Response/Direction
		<p>Appendix C2, Attachment 2—PHREEQC geochemical model output (3,800 pages)</p> <p>Appendix D1.3—Bedded sediment summary stats (244 pages)</p> <p>Appendix D2.2—Mobile sediment summary stats (49 pages)</p> <p>Appendix D3.2—Surface water summary stats (148 pages)</p> <p>Appendix D4.1—TZW and seeps summary stats (6 pages)</p> <p>Appendix D5.1—Biota summary stats (25 pages)</p> <p>Appendix E, Attachment E-3—Data tables of upland soil chemistry (about 620 pages)</p> <p>Appendix F—BHHRA (3,200 pages)</p> <p>Appendix G—BERA (it's in 38 separate files—text alone is 870 pages)</p> <p>Appendix H—Sediment background data and ProUCL output</p>	